

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

Re'shane Lonzo, Personal Representative
of the Estate of Richie Majors, Deceased,

Plaintiff,

Case No.: 2:16-cv-13672
District Judge: Mark A. Goldsmith
Magistrate Judge: David R. Grand

v.

Gerlach et al,

Defendants,

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Keith Altman (P81702)
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LL.M. (P37603)
Devlin K. Scarber (P64532)
Jeffrey L. Bomber (P85407)
*Attorneys for Savithri Kakani, P.A.
and Thomas LaNore, P.A.*
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**DEFENDANTS SAVITHRI KAKANI, P.A. AND THOMAS LANORE,
P.A.'S UNOPPOSED MOTION TO EXTEND THE DATE TO FILE
PRETRIAL MOTIONS AND MOTIONS IN LIMINE BY 14 DAYS, AND
JOINT FINAL PRETRIAL ORDER BY 10 DAYS**

EXHIBIT A Jan. 4 Correspondence with Plaintiff's Counsel

Jeffrey Bomber

From: Solomon Radner <solomon@radnerlawgroup.com>
Sent: Wednesday, January 4, 2023 11:38 AM
To: Devlin Scarber
Cc: Jeffrey Bomber; Carolina Andrade; Nelly Kossak; Keith Altman
Subject: Re: Majors: Stip and Order to Extend JFPTO and Pretrial Motions

yep. all good.

please let me know about records custodians.

On Wed, Jan 4, 2023 at 10:46 AM Devlin Scarber <dscarber@chapmanlawgroup.com> wrote:

Solomon:

This shall confirm we just spoke and talked about things you raised in your email and that, under any circumstances, briefing and decisions on these motions would likely not be accomplished prior to the Jan 23 date. You indicated that we have permission to submit the stip, and to see what the judge does, which we will do shortly.

Thanks,

DEVLIN K. SCARBER | Attorney

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or copying of this email is strictly prohibited. If you have received this email in error, please immediately notify us at (248) 644-6326.

From: Solomon Radner <solomon@radnerlawgroup.com>
Sent: Wednesday, January 4, 2023 10:31 AM
To: Devlin Scarber <dscarber@chapmanlawgroup.com>
Cc: Jeffrey Bomber <jbomber@chapmanlawgroup.com>; Carolina Andrade <candrade@chapmanlawgroup.com>; Nelly Kossak <nkossak@chapmanlawgroup.com>; Keith Altman <keithaltman@kaltmanlaw.com>
Subject: Re: Majors: Stip and Order to Extend JFPTO and Pretrial Motions

the court will never go for it, but you can title it unopposed motion and indicate that plaintiff takes no position and defers to the court's discretion. think about it: if the motions are filed jan 18, when will responses be filed if the FC is jan 23? and when will the court be able to consider and research the motions?

again, i won't object to any of this, but i seriously doubt the court will go for it.

On Wed, Jan 4, 2023 at 10:23 AM Devlin Scarber <dscarber@chapmanlawgroup.com> wrote:

Solomon:

We received 12/27/22 Order from court stating all pretrial motions and JFPTO are due 8 days and 13 days, respectively. That means all pretrial motions are due today (1/4/23), and JFPTO is due Monday, 1/9/23. We have contacted the court thinking the order may be in error and/or to request a short extension. Court advised us to submit a proposed order for an extension, and it would consider it.

Please advise asap today if the attached order is agreeable. We will then promptly submit to the court.

Thanks,

DEVLIN K. SCARBER | Attorney

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